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17 *Attorneys for Defendant Caesars Entertainment, Inc.*

18 *(Additional Counsel on Signature Page)*

19 **UNITED STATES DISTRICT COURT**
20 **DISTRICT OF NEVADA**

21 In re: DATA BREACH SECURITY
22 LITIGATION AGAINST CAESARS
23 ENTERTAINMENT, INC.

24 Case No. 2:23-cv-01447-ART-BNW

25 **CLASS ACTION**

26 **STIPULATION AND [PROPOSED]**
27 **ORDER REGARDING BRIEFING**
28 **SCHEDEULE FOR MOTION TO STAY**
DISCOVERY

29 **(First Request)**

1 WHEREAS, on September 12, 2024, Caesars filed a Motion to Dismiss Plaintiffs'
 2 Consolidated Class Action Complaint ("Motion to Dismiss");

3 WHEREAS, Caesars' position is that discovery should be stayed while its Motion to
 4 Dismiss is pending, on grounds that the Motion to Dismiss makes arguments that are dispositive
 5 of the entire case, and which can be resolved without the need for discovery;

6 WHEREAS, Plaintiffs oppose Caesars' request for a discovery stay, on grounds that a stay
 7 is not warranted and would result in unnecessary delay;

8 WHEREAS, in light of the Parties' positions, the Parties agreed that Caesars would file a
 9 Motion to Stay, which Plaintiffs plan to oppose;

10 WHEREAS, on August 27, 2024, the Court entered a schedule for the briefing of Caesars'
 11 Motion to Stay, based on an agreed proposal submitted by the Parties, under which Caesars is
 12 currently due to file the Motion to Stay by October 30, 2024;

13 WHEREAS, in light of the existing schedule for the Motion to Dismiss, the Parties have
 14 agreed that good cause exists to adjust the schedule for Caesars' Motion to Stay, and to extend the
 15 time for Caesars to file the Motion to Stay by two weeks, until November 13, 2024. There is good
 16 cause to grant this request, which is not made for the purposes of delay, and which continues to
 17 ensure that the Motion to Stay will be fully briefed shortly after the Motion to Dismiss.

18 It is therefore **STIPULATED** and **AGREED** that:

- 19 1. Caesars shall file its Motion to Stay Discovery ("Motion") on or before November
 13, 2024.
- 21 2. Plaintiffs shall file any opposition to the Motion on or before December 3, 2024.
- 22 3. Caesars shall file any reply in further support of the Motion on or before December
 13, 2024.

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1 Dated: October 29, 2024.

2 **McDONALD CARANO LLP**

3 /s/ Chelsea Latino

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49 *Liaison Counsel for Plaintiff*

50 **IT IS SO ORDERED:**

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 53 UNITED STATES MAGISTRATE JUDGE

54 DATED: October 30, 2024